

EXHIBIT 33

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE: §
§
ALLIANCE FARM AND RANCH, LLC § **Bankruptcy Case No. 25-30155**
and §
ALLIANCE ENERGY PARTNERS, LLC §

STATE OF TEXAS §
§
COUNTY OF HARRIS §

DECLARATION OF NOAH MEEK

Pursuant to TEX. CIV. PRAC. & REM. CODE § 132, I, Noah Meek, make the following declaration:

1. My name is Noah Meek, I am over 18 years of age, of sound mind, and capable of making this declaration. I am an attorney licensed in Texas and am counsel for Plaintiff Dustin Etter in the above-referenced lawsuit. The facts and opinions set forth in this declaration are true and correct and within my personal knowledge.
2. I have been licensed to practice law in the State of Texas since May of 2014. I have regularly practiced civil litigation, including real estate litigation, in Texas throughout my entire career, with most of my practice being in courts in the greater Houston area, including in Harris County, Texas and Montgomery County, Texas. I practiced at what is likely the largest Montgomery County, Texas-based law firm, Gauntt Koen Binney & Kidd, LLP, from March 2022 to November 2024. I have extensive experience, including as lead counsel in civil litigation in Montgomery County, Texas, as well as in Harris County, Texas. My practice also includes real estate litigation, including foreclosure defense and other foreclosure-related litigation. My practice has included multiple cases in which other parties have sought to recover attorney's fees, so I am aware not only of my own rates but am familiar with a broad sampling of rates and charges charged by other counsel practicing in the same or similar areas. Through my knowledge, skill, and experience, I am knowledgeable of and familiar with the reasonable, usual, and customary rates and charges for real estate litigation in both Harris County, Texas and Montgomery County, Texas, as well as in surrounding areas.
3. I have never seen anyone charge \$600/hour or more for any civil case in state court in Montgomery County, Texas, even in complex business litigation involving a million dollars or more in controversy. The highest hourly rate I have ever seen anyone charge in a civil case in Montgomery County, Texas is \$500/hour. The highest tier rates (i.e. partner rates for experienced attorneys and well-known

firms) tend to max out at \$450/hour and are often less. Also, rates for litigation in Montgomery County, Texas tend to be slightly less than in Harris County, Texas.

4. The same pattern is the case for foreclosure defense and related real estate litigation in the greater Houston area. I have never seen anyone charge \$600/hour or more for foreclosure defense or related real-estate litigation. Again, rates tend to max out for the highest rate tier at \$450/hour.
5. For the reasons stated above, \$600/hour is above a reasonable hourly rate for representing Alliance Farm & Ranch, LLC in a foreclosure defense action or in related real estate litigation in Montgomery County, Texas or Harris County, Texas. The highest reasonable hourly rate would be \$450/hour, with rates lower than (i.e. in the \$300s/hour to the low \$400s/hour) that also being common.

My name is Noah Earnest Wotring Meek, I was born on 3/28/1988, and my address is 2520 Caroline, 2nd Floor, Houston, Texas 77004. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Harris County, State of Texas, on the 14th day of May, 2025.

/s/ Noah Meek

Noah Meek